

EXHIBIT 2

SUPPLEMENTAL DECLARATION OF H. DEAN STEWARD

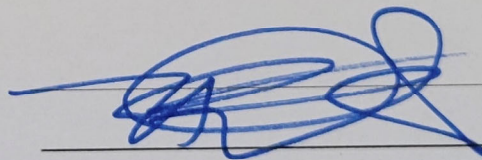
I, H. Dean Steward, declare:

1. I am a practicing attorney licensed in the State of California. I have served as counsel to Mr. Michael Avenatti in connection with multiple matters, including *United States v. Michael John Avenatti* (CDCA Case No. SA CR No. 19-061-JVS) and *United States v. Michael John Avenatti* (SDNY Case No. 19-cr-373-JMF). If called to testify, I would competently provide testimony consistent with this declaration.

2. This declaration serves to supplement my previous declaration dated January 13, 2022. The advice I described in paragraph 2 of that declaration included advice to Mr. Avenatti that not filing the state and federal tax returns I referenced was permitted and lawful for the reasons I stated in my prior declaration, including because Eagan Avenatti, LLP had a receiver appointed in February 2019, which I understood prevented Mr. Avenatti from filing any tax returns for that entity, and Mr. Avenatti's right to invoke the Fifth Amendment.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: January 17, 2022



H. DEAN STEWARD